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1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 2 Bruce E. Van Dalsem (Bar No. 124128)  
 brucevandalsem@quinnemanuel.com  
 3 David W. Quinto (Bar No. 106232)  
 davidquinto@quinnemanuel.com  
 4 B. Dylan Proctor (Bar No. 219354)  
 dylanproctor@quinnemanuel.com  
 5 865 South Figueroa Street, 10<sup>th</sup> Floor  
 Los Angeles, California 90017-2543  
 Telephone: (213) 443-3000  
 6 Facsimile: (213) 443-3100

7 Attorneys for American Rena International  
 Corp., WanZhu "Kathryn" Li, and Robert  
 8 M. Milliken

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10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA  
 12 WESTERN DIVISION

13 American Rena International Corp., a  
 14 California corporation; WanZhu  
 "Kathryn" Li, an individual; and Robert  
 15 M. Milliken, an individual,

16 Plaintiffs,

17 vs.

18 Sis-Joyce International Co. Ltd., a  
 19 California corporation; Alice "Annie"  
 Lin, an individual; Virginia Wu, an  
 individual; and DOES 1-10,

20 Defendants.

CASE NO. 06972 DMG (JEMx)  
 COMPLAINT FOR:

1. FEDERAL TRADEMARK INFRINGEMENT;
2. COMMON LAW TRADEMARK INFRINGEMENT;
3. TRADEMARK CANCELLATION;
4. FEDERAL UNFAIR COMPETITION;
5. COPYRIGHT INFRINGEMENT;
6. VIOLATION OF THE ANTI-CYBERSQUATTING CONSUMER PROTECTION ACT;
7. TRADE SECRET MISAPPROPRIATION;
8. INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE;
9. TRADE LIBEL;
10. FALSE LIGHT INVASION OF PRIVACY;
11. VIOLATION OF RIGHT OF PUBLICITY;

BY \_\_\_\_\_

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12. **CALIFORNIA STATUTORY  
UNFAIR COMPETITION;**
13. **CALIFORNIA COMMON LAW  
UNFAIR COMPETITION;**
14. **RACKETEER INFLUENCED  
AND CORRUPT  
ORGANIZATIONS ACT  
VIOLATION;**
15. **CONSPIRACY TO VIOLATE  
RICO; AND**
16. **UNJUST ENRICHMENT**

**JURY TRIAL DEMAND**

1 Plaintiffs American Rena International Corp. (“Rena”), WanZhu (“Kathryn”)  
 2 Li, and Robert M. Milliken (“Milliken”) complain and allege as follows against  
 3 defendants Sis-Joyce International Co. Ltd., (“Sis-Joyce”), Alice “Annie” Lin  
 4 (“Lin”), Virginia Wu (“Wu”), and DOES 1-10 as follows:

5 **NATURE OF THE ACTION**

6 1. This is an action to prevent the complete theft of a business – lock,  
 7 stock, and barrel. Plaintiff WanZhu “Kathryn” Li is an entrepreneur who began  
 8 manufacturing and distributing skincare products in Los Angeles, California in  
 9 2006. The company she founded, plaintiff Rena, quickly grew to directly employ 20  
 10 persons in California. By 2010 Rena generated \$30 million in annual sales, with the  
 11 bulk of that sum resulting from exports to the People’s Republic of China and other  
 12 countries in Asia.

13 2. Defendants Lin and Wu were customers and independent sales agents  
 14 for Rena’s products who are embarking on a brazen scheme to compete unfairly  
 15 with Rena and, ultimately, steal its business altogether. Initially, Lin and Wu  
 16 engaged in straightforward counterfeiting – they manufactured counterfeit labels  
 17 using Rena’s proprietary RENA and RENA BIOTECHNOLOGY marks, applied  
 18 them to generic bottles, and then sold adulterated RENA products they had  
 19 purchased from Rena in competition with Rena. When Rena learned of Lin’s and  
 20 Wu’s perfidy in late 2010, it cut off their supply of RENA products. On information  
 21 and belief, Lin and Wu then attempted to pass off bottles of tap water as genuine  
 22 RENA products.

23 3. Lin and Wu were neither deterred by Rena’s cutting off their supply of  
 24 products nor satisfied with the harm they had caused through their counterfeiting.  
 25 On the contrary, when Rena sought to put an end to their counterfeiting of authentic  
 26 RENA products, Lin and Wu embarked on a secret campaign to co-opt the market  
 27 for RENA products, and to hijack Rena’s entire business. Operating under the name  
 28 of defendant Sis-Joyce, Lin and Wu secretly told Rena’s consumers that Rena was

1 out of business and that defendant Sis-Joyce – an entity owned by Lin and Wu –  
2 now sold RENA products. Lin and Wu released a competing product called  
3 “ARëna,” which they labeled as “new” and “improved.” Lin and Wu went so far as  
4 to claim in marketing materials that “**Rena is Now aRena!.**,” and described  
5 “ARëna” as an “Activation Energy Serum” – the same description that Rena uses  
6 for its product. Lin and Wu falsely told Rena’s independent sales agents and  
7 customers that Rena had been acquired by “ARëna” or sold its proprietary product  
8 formulas to “ARëna,” and that Rena’s “new” products *were* “ARëna.” Lin and Wu  
9 launched websites, including [www.RenaSkin.com](http://www.RenaSkin.com) and [www.ArenaSkin.com](http://www.ArenaSkin.com), which  
10 copy vast quantities of copyrighted materials from Rena’s website and even include  
11 the names and photographs of *Rena*’s founders. Lin and Wu launched YouTube  
12 videos displaying and advertising *Rena*’s products, but directing the public to Lin  
13 and Wu’s knockoff websites. And Lin and Wu sold their “ARëna” products in  
14 bottles that precisely copy the highly distinctive .51 oz plastic bottle designed by  
15 Rena for its principal product, the RENA Activation Energy Serum.

16 4. Since Lin and Wu launched their bogus “ARëna” products and engaged  
17 in their campaign to steal Rena’s business and customers, Rena’s worldwide sales  
18 have dropped astronomically – from an average of approximately \$2.5 million a  
19 month as of 2010 and early 2011 to less than \$500,000 a month now. By purporting  
20 to *be* Rena, defendants have destroyed virtually all of Rena’s U.S. sales and are now  
21 cutting substantially into its foreign sales. Unless enjoined, Lin and Wu will  
22 complete what they set out to achieve – the wholesale theft of Rena’s business.

23 5. On July 4, 2012, Rena was notified by several sales agents in China of  
24 overtures received from Lin and Wu to sell purported “ARëna” products. It was  
25 only then that Rena discovered Lin and Wu’s surreptitious effort to steal Rena’s  
26 business and clients through their misleading statements to purchasers, and it was  
27 only then that Rena discovered Lin and Wu’s infringing “ARëna” products.

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1       6. Plaintiffs seek preliminary and permanent injunctive relief to enjoin  
 2 and restrain defendants' acts of trademark infringement, copyright infringement,  
 3 false and deceptive advertising, trade secret misappropriation, trade libel,  
 4 interference with prospective economic advantage, unfair competition, and invasion  
 5 of privacy; cancellation of defendant Lin's NEW! ARËNA ACTIVATION  
 6 ENERGY SERUM trademark; an order transferring ownership of the purported  
 7 [www.RenaSkin.com](http://www.RenaSkin.com) and [www.ArenaSkin.com](http://www.ArenaSkin.com) domain names to Rena; an order  
 8 impounding the infringing goods; restitution of defendants' illicit gains; damages;  
 9 and punitive and exemplary relief.

10

### PARTIES

11       7. Plaintiff Rena is a California corporation having its principal place of  
 12 business in Los Angeles, California.

13       8. Plaintiff WanZhu Li is an individual who resides in Los Angeles  
 14 County, California. Li is sometimes known by her Chinese nickname, "WenJia,"  
 15 and sometimes by her American name, "Kathryn."

16       9. Plaintiff Robert M. Milliken is an individual who resides Los Angeles  
 17 County, California. Milliken is the Chief Executive Officer of Rena.

18       10. Defendant Sis-Joyce is a California corporation having its principal  
 19 place of business in Elk Grove, California, and having 2 "leaders" in Los Angeles  
 20 County, California, and one in San Francisco, California. Sis-Joyce is owned, in  
 21 whole or in part, by defendant Lin.

22       11. Defendant Alice "Annie" Lin is an individual who, upon information  
 23 and belief, resides in Fremont, California and is an owner of Sis-Joyce.

24       12. Defendant Virginia Wu is an individual who, upon information and  
 25 belief, resides in Los Angeles County, California. She is identified on the Sis-Joyce  
 26 website as one of Sis-Joyce's three "leaders," enjoying co-responsibility for Sis-  
 27 Joyce's Los Angeles operations.

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1       13. Plaintiffs are ignorant of the true names and capacities of the  
2 defendants who are named herein under the fictitious names DOES 1-10, inclusive.  
3 Plaintiffs will seek leave of the court to amend the complaint to allege their true  
4 names and capacities when ascertained. Plaintiffs are informed and believe, and  
5 based thereon allege, that each of the fictitiously named DOE defendants is  
6 responsible in some manner for the wrongful conduct alleged herein. Plaintiffs  
7 further allege that each defendant acted in concert and participation with, as agent of  
8 or representative for, at the request of, or on behalf of Sis-Joyce and/or Lin. Each  
9 charge and allegation alleged herein is, therefore, also hereby alleged against each  
10 fictitiously named DOE defendant.

## **JURISDICTION AND VENUE**

14. This action arises under the Lanham Trademark Act, 15 U.S.C. Sections 1116, 1117, and 1125(a) and (d); 17 U.S.C. Sections 101, *et seq.*; and 18 U.S.C. Section 1964(c). This Court has original subject matter jurisdiction pursuant to 20 U.S.C. Section 1331, *et seq.*; 28 U.S.C. Sections 1331 and 1338; 15 U.S.C. Sections 1116 and 1121; and 18 U.S.C. Section 1964(c). This Court has supplemental jurisdiction over plaintiffs' state law claims pursuant to 28 U.S.C. Section 1337.

19       15.   Venue lies in this District pursuant to 28 U.S.C. Sections 1391(b) and  
20 (c); 28 U.S.C. Section 1400(a); and 18 U.S.C. Section 1965.

## FACTUAL ALLEGATIONS

## Rena's Business and Trademarks

23       16. Rena is an internationally acclaimed manufacturer and distributor of  
24 high-end skin care, healthcare, and anti-aging products located in Los Angeles,  
25 California. Since June 2006, it has sold its products using its RENA and RENA  
26 BIOTECHNOLOGY trademarks. RENA BIOTECHNOLOGY is registered in the  
27 United States in International Class 5. Rena was founded and is owned by plaintiff  
28 Kathryn Li, who is also the registered owner of its trademarks and who has granted

1 an exclusive license of those trademarks to Rena. Plaintiff Robert Milliken is  
 2 Rena's Chief Executive Officer.

3       17. Rena manufactures and sells a suite of health-related products,  
 4 including Activation Energy Serum, Activation Mist, and Activation Energy Elixir.  
 5 Rena's scientists have extracted nearly 100 minerals and trace elements for use in  
 6 products designed to help users resist the effects of aging. The Rena products  
 7 incorporating those natural minerals are absorbed through the skin and can reach a  
 8 depth of 30 to 50 millimeters. Rena's products are designed to reduce wrinkles,  
 9 inflammation, and pain while moisturizing skin and promoting skin health.

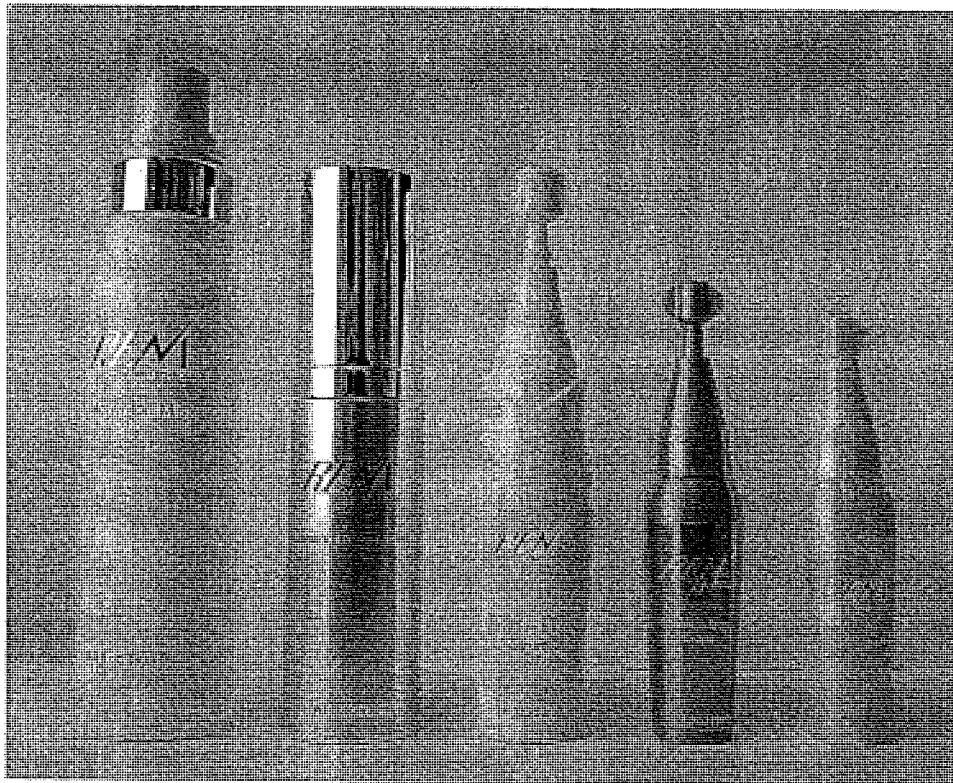
10      18. To protect its valuable and unique products, Rena has sought U.S.  
 11 trademark registrations for its marks. It obtained registration of its RENA  
 12 BIOTECHNOLOGY word mark, No. 3,332,867, in 2007 with a first-use-in-  
 13 commerce date of February 1, 2007. In April 2012, it applied for registration of a  
 14 stylized RENA BIOTECHNOLOGY mark, Serial No. 85,587,003, with a first-use-  
 15 in-commerce date of June 29, 2006. The stylized RENA BIOTECHNOLOGY  
 16 mark, used on all Rena products since June 2006, is shown below.



21      19. In addition, in April 2012, Rena applied to register various other  
 22 stylized RENA and RENA BIOTECHNOLOGY marks, using both English letters  
 23 and Chinese characters, including the stylized RENA mark standing alone. Those  
 24 applications are currently pending.

25      20. The authentic products sold by Rena prominently display the RENA  
 26 and RENA BIOTECHNOLOGY marks, as shown below:

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 28



**Defendants' Counterfeiting**

21. At one time, Lin and Wu were authorized distributors of RENA products. Yet while they were only authorized to sell genuine RENA products – placing orders that would be fulfilled by Rena itself – Lin and Wu in fact started selling adulterated RENA products by applying counterfeited labels that used Rena's protected trademarks to generic spray bottles, which were then filled with diluted RENA products and sold as genuine.

22. The photograph below depicts exemplars of two bottles used by defendants to sell their counterfeit RENA products.



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18 23. Upon discovering this counterfeiting in or about October or November  
19 2010, Rena discontinued Lin and Wu's supply of RENA products, believing that  
20 cutting off Lin's and Wu's supply of product would force an end to their  
21 counterfeiting and infringement.

22 24. But Lin and Wu did not abandon their illegal activities. Instead, on  
23 information and belief, they started selling tap water or contents other than the  
24 genuine Rena product, which they passed off as genuine RENA products using their  
25 counterfeit labels.

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## Defendants' Fraudulent Websites

2        25. Starting in or about early 2011, Lin and Wu, operating through  
3 defendant Sis-Joyce, started manufacturing and selling their so-called “ARëna”  
4 products, including through fraudulent and infringing websites.

5 26. Defendants registered the www.RenaSkin.com website through an  
6 intermediary or using an assumed name, “Damon Rith,” in an effort to hide her  
7 involvement in the site. The “WHO IS” look up reflects that “Damon Rith” is the  
8 registrant, administrative contact, and technical contact for RenaSkin.com and that  
9 he purportedly resides at “123 Reed Street” in Blue Bell, Pennsylvania 19422 – an  
10 address that does not exist. There is also apparently no known record of “Damon  
11 Rith” in Pennsylvania. The RenaSkin.com domain name was registered using false  
12 contact information in an effort to hide the identity of the actual registrant.

13        27. The RenaSkin.com website has been carefully crafted to cause  
14 maximum confusion with plaintiff Rena's genuine products and plaintiff's  
15 AmericanRena.com website. Virtually every page of the site has the following  
16 header: "***Genuine American Rena Anti-Aging Activation Serum.***" The site  
17 declares that "Rena Activation Energy contains innovative materials, processed  
18 from natural minerals by an advanced purifying technology." As shown below, the  
19 site displays a photograph of Rena's founder, Kathryn Li, and its Chief Executive  
20 Officer, Robert Milliken, with the caption, "Who performs research and  
21 development[?] Where does manufacturing take place?"

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**Genuine American Rena Anti-Aging Activation Serum**

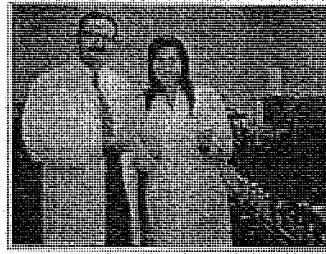
a more youthful you

[HOME](#) | [About Us](#) | [Testimonials](#) | [Order](#)

**Our Company**

- [Rena Serum](#)
- [Research](#)
- [Effectiveness](#)
- [Alkalize Water](#)
- [Q & A](#)
- [Testimonials](#)
- [Distributors](#)
- [Translate](#)

**PHYSICAL HEALTH, EMOTIONAL HEALTH AND SPIRITUAL HEALTH!**

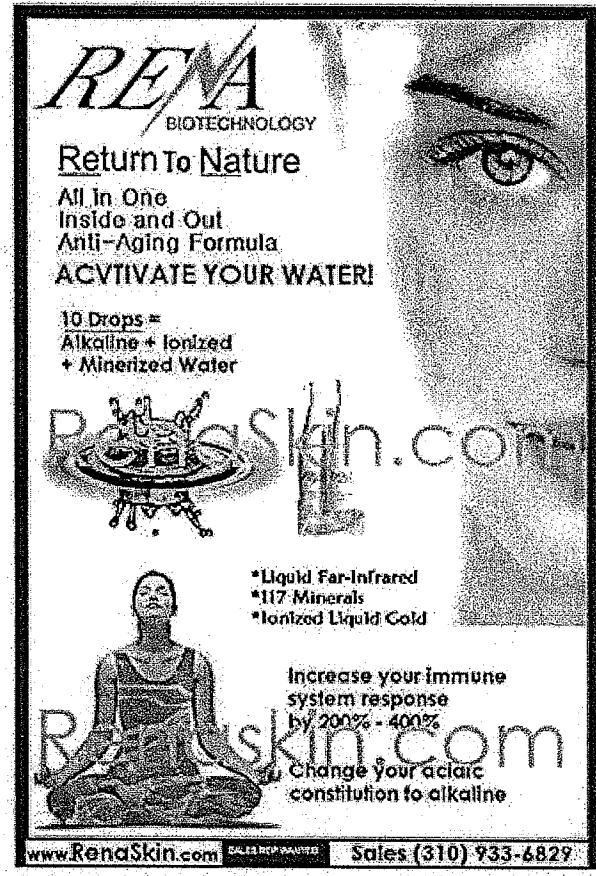


**1. Who performs research and development Where does manufacturing take place?**

With "creating health and beauty" and advocating "green [natural] products" as guiding principles, American RENA International Corp has hired doctors of medicine and scientists with many years of abundant clinical experience to our research staff.

The manufacturing plant is not only a factory **approved by the U.S. FDA**, it has GMP manufacturing standards, and also has licenses and certificates issued by the state government for products with special effects and the qualification to produce pharmaceuticals.

28. The site copies substantially all the designs, graphics, photographs and text of the AmericanRena.com website. The site declares, in the "Q&A" section, that "American RENA external use products ... do not contain alcohol or preservatives" in response to the question, "I've heard that American RENA Activation Spray external spray products are very effective at restoring and preserving skin with pimples or have been damaged as a result of using cosmetics containing lead, mercury, or stimulants - is this true?" Remarkably, the RenaSkin.com website even has a large reprint of Rena's stylized RENA BIOTECHNOLOGY trademark (shown below) and depictions of Rena's products and brochures.



29. The purported RenaSkin.com website copies extensively from Rena's AmericanRena.com website, even to the extent of reproducing a letter authored by Mr. Milliken. The purported RenaSkin.com site includes such headings as "RENA-LIQUID FAR INFRARED = ALKALINE NEGATIVE ION" and "DESCRIPTION OF RENA LIQUID LIFE ACTIVATION ENERGY PRODUCTS," and contains descriptions of "American Rena Activation Serum," among numerous references to "American Rena," "American RENA," and "RENA." It contains a "COMPARISON OF BOTOX VERSUS American RENA," and depicts two pages copied from the American Rena brochure and website. Still further, the stylized RENA BIOTECHNOLOGY trademark appears in conjunction with references to the purported RenaSkin.com website.

30. Rena is further informed and believes that although the www.ArenaSkin.com website was purportedly registered by an intermediary or

1 using an assumed name, “Dave Simms,” it is in fact owned and controlled by  
2 Defendants. The “WHO IS” information provided to the registrar of the  
3 ArenaSkin.com domain name reflects that (i) the registrant is “Dave Simms,” (ii) the  
4 administrative contact is “Dave Ded,” (iii) the technical contact is “Dave Sed,”  
5 (iv) Ded and Sed can be found at “123 Red Road” in Blue Bell, Pennsylvania  
6 19422; and (v) Simms can be found at “124 Red Road” in Blue Bell, Pennsylvania  
7 19422. In fact, there is no “Red Road” in Blue Bell, nor does there appear to be a  
8 “David Simms” in that city. Thus, as to the ArenaSkin.com website as well, the  
9 registrar was provided with false information to hide the true names and capacities  
10 of the registrant, administrative contact, and technical contact.

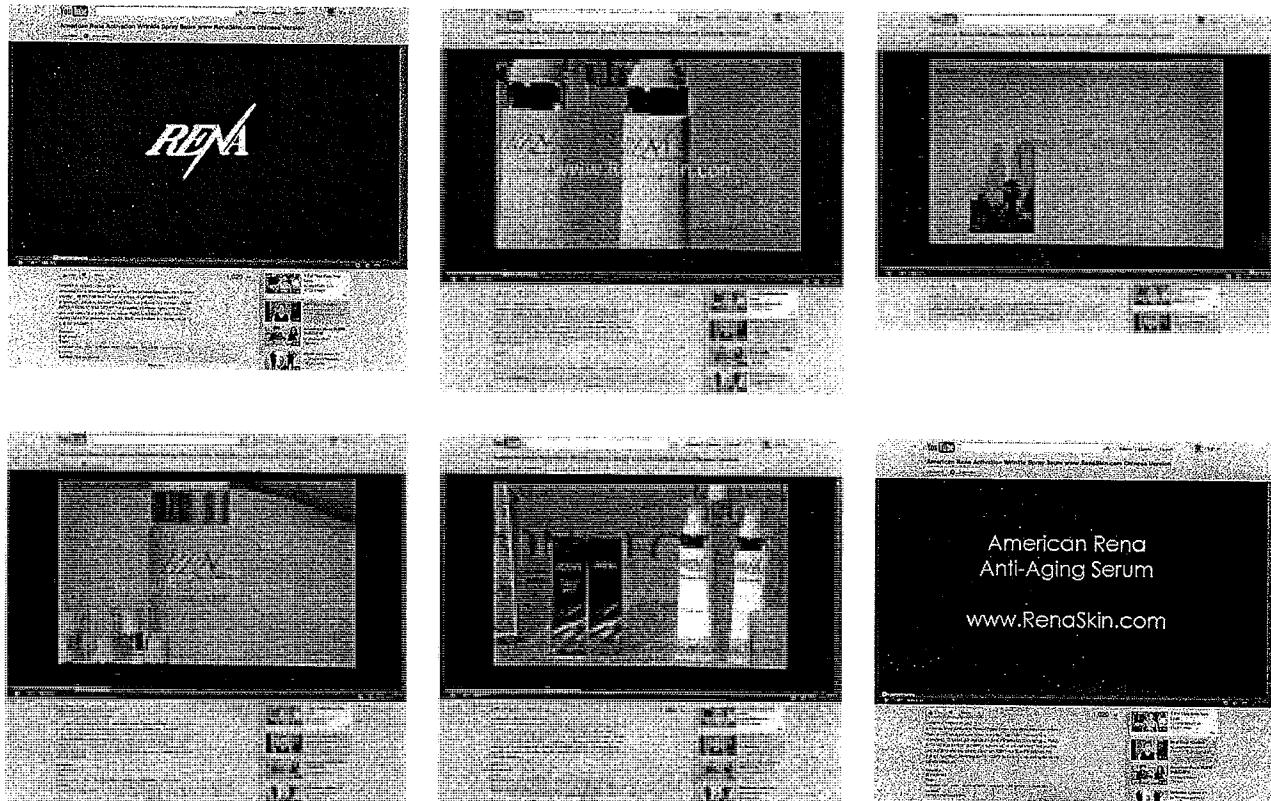
11        31. The purported ArenaSkin.com site is very similar to the RenaSkin.com  
12 site, and is equally infringing of Rena's rights. For example, the header at the top of  
13 each page has been modified to proclaim, "***Genuine American aRena Anti-Aging***  
14 ***Activation Serum***" - but is accompanied by the explanation that, "**Rena is Now**  
15 **aRena!**" The purported "aRena" products are described as having a "**New**  
16 **Improved Formula**" in an effort to persuade consumers that Rena has become  
17 "ARëna" when it has not. It, too, copies without authorization a letter authored by  
18 Rena's Chief Executive Officer, Robert Milliken, extolling the benefits of genuine  
19 Rena products. Further, it has extensively copied graphics and text from Rena's  
20 website.

32. In addition, many of the images, graphics, and scientific references  
33 found on Rena's website ([www.AmericanRena.com](http://www.AmericanRena.com)) also appear on Sis-Joyce's  
34 website ([www.SisJoyce.com](http://www.SisJoyce.com)), purportedly registered by a third party but  
35 beneficially owned by Lin.

## **Defendant's Fraudulent Advertisements**

26 33. Defendants have also taken measures to directly trade on the goodwill  
27 and popularity of Rena's products in advertisements for their own infringing  
28 products. For example, defendants posted YouTube videos that *appear* to promote

1 genuine RENA products – and display those products, and even Rena’s place of  
2 business in Los Angeles – but then direct consumers to the bogus RenaSkin.com  
3 website that sells defendants’ infringing goods. Screen shots of defendants’  
4 fraudulent videos posted on YouTube include the following:



19 34. Still further, defendants provide fliers and brochures with their products  
20 that use many of the same photographs, images and designs as appear in Rena’s  
21 promotional materials. Indeed, the RenaSkin.com website itself displays Rena’s  
22 promotional brochures in an effort to sell the infringing “ARëna” products, as  
23 shown:

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## RENA Product Effectiveness

Internal use: Dilute 10 drops of Energy Serum in 3 oz (90 ml) of warm water & take it 30 minutes after a meal, once or twice daily.

- Increases enzymatic antibody by 2-4 Times
- Anti Inflammatory
- Anti-oxidant, anti-bacterial
- DNA cell activator
- Decomposes toxins
- Decomposes fats
- Decomposes sugar
- Improves Sleep
- Acidic to Alkaline Body conversion

External use: Spray it as needed, multiple times daily, on your face and body.

- Defies Dermatological Aging Process
- Anti-Wrinkle Anti-Aging
- Moisturizing
- Protection Against Ultraviolet Rays
- Electromagnetic Wave Resistance
- Static Electricity Prevention
- Powerful internal cleanser

## Drink &amp; Spray – Rejuvenates All Body Cells

## Reported Improvements:

- Wrinkles, Face Spots, Eye Circles, 99% UV Protection
- White hair reversal, Dandruff, Headaches
- Dry eyes, Glaucoma, Cataract, Floaters in the eyes
- Acne, Pimples, Rosacea, Psoriasis, Alopecia
- Tooth Ache, Sore Throat, Bad Breath, Herpes
- Body Firming, Weight Loss (Drink + spray multiple times on navel and abdomen)
- Hemorrhoids, Spider Veins, Moles, Arthritis
- Autism, Cholesterol, Gout, Stroke, Diabetes, High Blood Pressure, Arthritis and many others

Note: Depending on each person's body-condition, the rate of improvements may vary from person to person.

## RENA = A WRINKLE-FREE World

## \* Face Lift in Minutes \*

The American RENA Activation Energy Spray, leveraging the liquid far-infrared, penetrates 3-5 cm under your skin to the dermal layer and beyond, delivering the natural minerals our cells desperately need. Our ionized GOLD will re-energize your skin's damaged collagen tissue and will rejuvenate all your body cells. In just a few minutes your face is lifted, rejuvenated and wrinkles reduced magically.

Compared to Botox, the RENA liquid face lift is painless,rinkle, cost effective and natural. Best of all besides a younger and prettier face, RENA will beautify You from the inside out in a R.E. (Natural) Way.

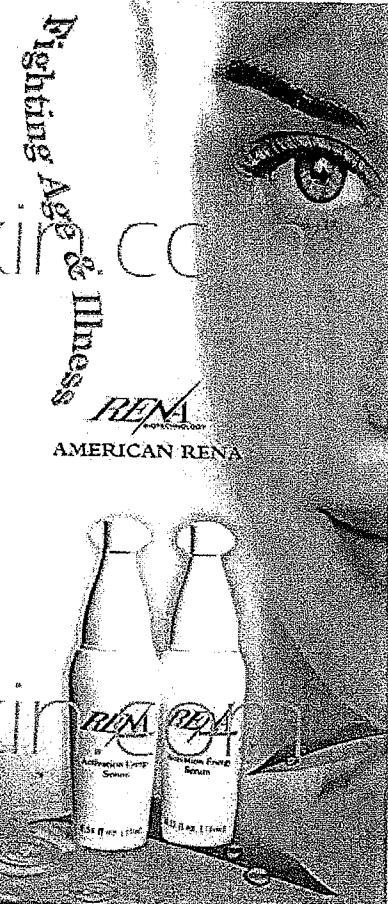
#	Category	Botox	RENA
1	Reduces wrinkles & face lines	Yes	Yes
2	Rejuvenates the skin	No	Yes
3	Maximizes firmness and elasticity	No	Yes
4	Mineralizes and Hydrates	No	Yes
5	Refines skin complexion	No	Yes
6	Non-Skin irritation	No	Yes
7	Non-Invasive treatments	No	Yes
8	Non-Surgical treatments	No	Yes
9	Non-toxicity of the nervous system	No	Yes



For orders and information please contact:

American Rena USL INC.

[www.RenaSkin.com](http://www.RenaSkin.com)  
(310) 933-6829



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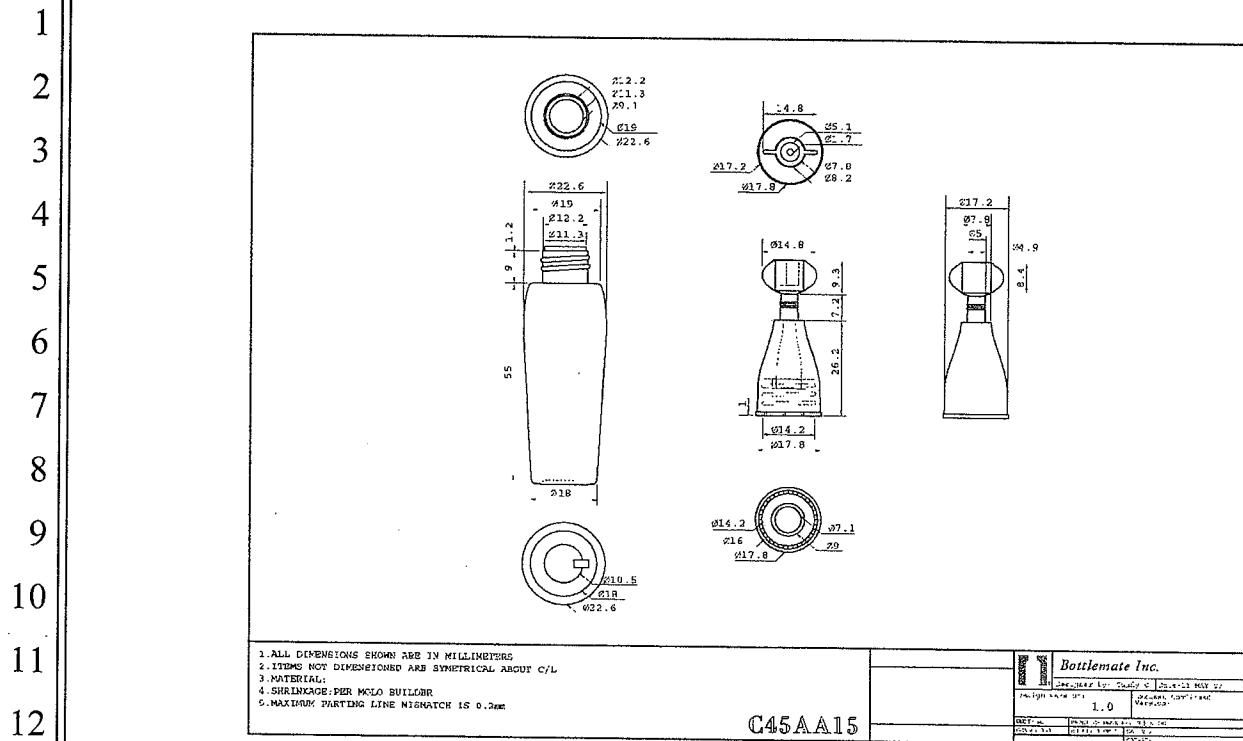
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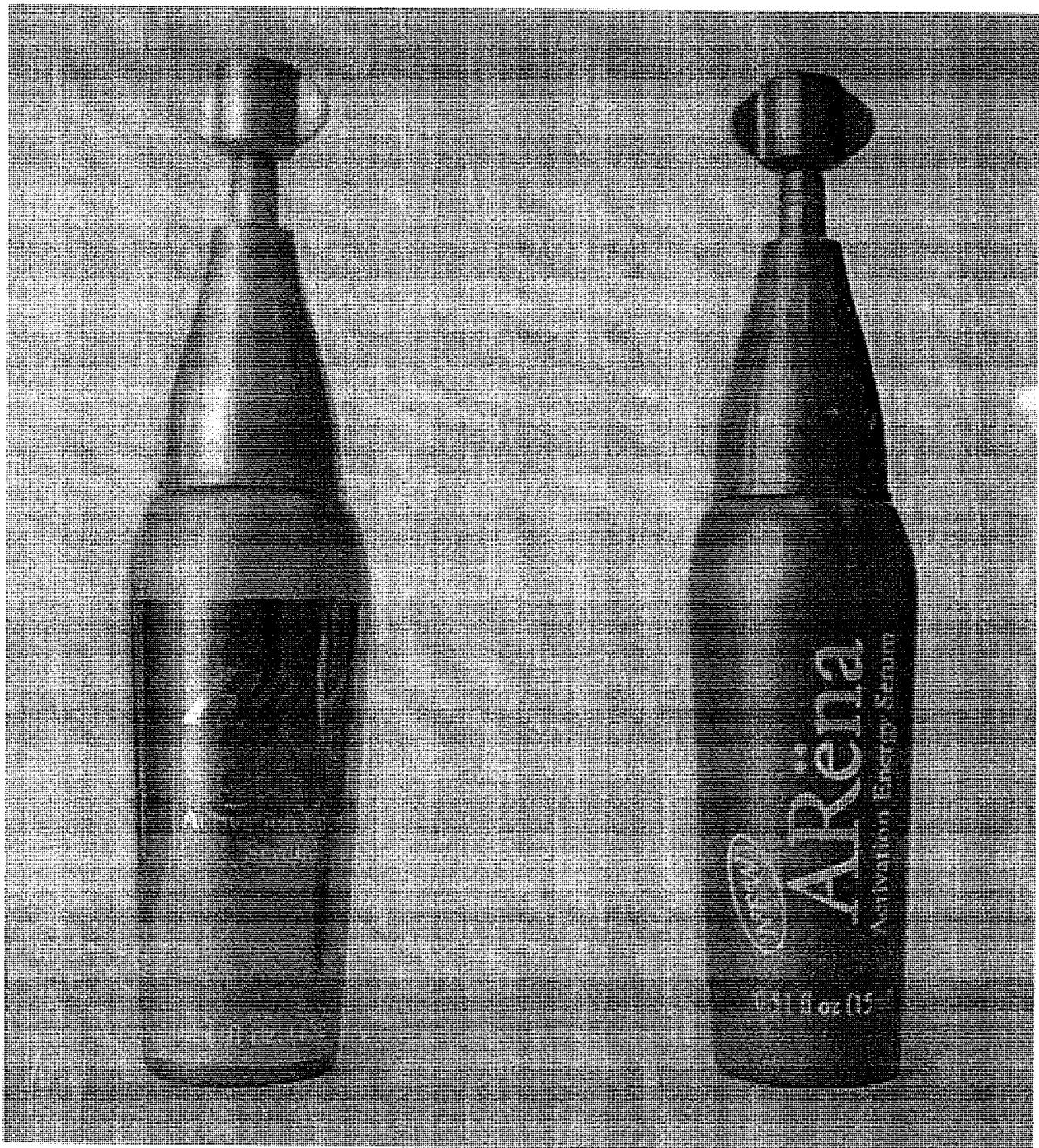
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## Defendants' Infringing Trade Dress

35. Not satisfied with merely using and infringing upon Rena's trademarks and copyrights, Defendants have also sold their knock-off "ARëna Activation Energy Serum" product in a manner that infringes Rena's trade dress. Rena sells its RENA Activation Energy Serum product in a distinctive, specially designed .51 fluid ounce bottle that is typically lavender in color. The engineering drawings of Rena's distinctive .51 fluid ounce Activation Energy Serum bottle are reproduced below.



14       36. To further create the misperception that the ARëna product is a Rena  
15 product, defendants sell their “ARëna Activation Energy Serum” product in a bottle  
16 that is identical in size and shape to the distinctive bottle used by Rena; with a  
17 similar color; and with the infringing “ARëna” name and the same “Activation  
18 Energy Serum” description that appears on the genuine RENA product. The visual  
19 similarity between Rena’s Activation Energy Serum product and that sold by  
20 defendants is striking. Reprinted immediately below is a photograph of Rena’s  
21 Activation Energy Serum bottle, and defendants’ Activation Energy Serum bottle.



**Defendants' Infringing Mark**

37. Defendant Sis-Joyce obtained a registration of "Sis-Joyce" from the United States Patent and Trademark Office in International Class 3 on July 26, 2011 (identifying the registrant as defendant Lin). Nevertheless, defendants have chosen to trade on and exploit the extremely valuable goodwill that Rena has developed in

1 its RENA and RENA BIOTECHNOLOGY marks with the intent to arrogate that  
 2 goodwill to itself. In furtherance of that objective, defendants have obtained a  
 3 federal registration of a NEW! ARËNA ACTIVATION ENERGY SERUM mark,  
 4 as shown below:



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 10 38. Defendants have engaged in a coordinated effort to both directly  
 11 counterfeit genuine RENA products and also pass their products off as "new Rena"  
 12 products. Defendants Sis-Joyce, its owner, Lin, and its "leader" Wu, are now  
 13 aggressively marketing and selling purported "ARËna Activation Energy Serum"  
 14 products, often without making mention of Sis-Joyce and always in a manner  
 15 designed to cause confusion with genuine RENA products.

16 **Defendants' Interference With Rena's Business Relationships**

17 39. Rena's sales numbers dramatically reveal the effect of Defendants'  
 18 unfair competition and fraudulent activities. During calendar year 2009, Rena's  
 19 sales totaled just under \$17 million. During calendar year 2010, Rena's total sales  
 20 were approximately \$30 million and Rena's revenues easily exceeded \$1 million  
 21 during each month of the year. In August 2011, Rena did approximately \$2.2  
 22 million in business, but that was the last time it achieved seven-figure sales. Since  
 23 then, its monthly sales have steadily declined, dropping to just \$271,000 in June of  
 24 2012. Absent immediate relief, Rena, which less than one year ago had a very  
 25 successful and growing export business, will be out of business altogether.

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## **FIRST CLAIM FOR RELIEF**

(Statutory Trademark Infringement by Rena and Kathryn Li against all Defendants)  
(15 U.S.C. § 1114)

40. Plaintiffs Rena and Kathryn Li incorporate and re-allege paragraphs 1-39 of this Complaint.

41. Kathryn Li owns, and Rena has the exclusive right to use, the federally registered RENA BIOTECHNOLOGY trademark in connection with Rena's products. The RENA BIOTECHNOLOGY trademark is highly distinctive and fanciful, and has earned a strong secondary meaning within the organic, natural anti-aging products market.

42. Defendants' use of their purported "ARëna," "aRena," and "aRENA" marks on directly competing products has infringed, and is infringing, the RENA BIOTECHNOLOGY trademark.

43. Likewise, Defendants' sales of products using the RENA BIOTECHNOLOGY mark and uses of the RENA BIOTECHNOLOGY mark to promote sales of their "ARëna," "aRena," and "aRENA" products has infringed, and is infringing, the RENA BIOTECHNOLOGY trademark.

44. Defendants' use of their infringing marks is likely to cause confusion, cause mistake, or deceive consumers as to the affiliation, connection or association of defendants and their products with those of Rena, and is likely to cause confusion, cause mistake, or deceive consumers as to the origin, sponsorship, or approval by Rena of defendants' products. Such likelihood of confusion is magnified by defendants' intentional use of deceptively similar product packaging, deceptively similar websites, and deceptively similar domain names intended to cause confusion with Rena's products, as well as by frequent advertising references to "American Rena" intended to cause confusion with Rena's [www.AmericanRena.com](http://www.AmericanRena.com) website, and by infringements of Rena's product brochures, flyers, and website.

1       45. Defendants' use of their infringing variations of the purported "ARëna"  
2 mark enables defendants to benefit unfairly from Rena's reputation and success,  
3 thus giving defendants' infringing products sales and commercial value they would  
4 not otherwise have.

5       46. Prior to defendants' first use of their infringing marks, defendants were  
6 aware of Rena's business and, indeed, defendants Lin and Wu had served as  
7 distributors of Rena's products. Further, defendants had actual notice and  
8 knowledge, or constructive notice, of plaintiffs' registered trademarks.

9       47. Defendants' infringement of the registered trademark as described  
10 herein has been and continues to be intentional, willful and without regard to the  
11 rights of Rena and Kathryn Li.

12       48. Rena and Kathryn Li are informed and believe, and on that basis allege,  
13 that defendants have gained profits by virtue of their infringement of the RENA  
14 BIOTECHNOLOGY trademark.

15       49. Plaintiffs will suffer, and are suffering, irreparable harm from  
16 defendants' infringement of their registered trademarks insofar as their invaluable  
17 goodwill is being misappropriated by defendants' continuing infringement.  
18 Plaintiffs Rena and Kathryn Li have no adequate remedy at law to compensate them  
19 for the loss of business reputation, customers, market position, and goodwill and  
20 confusion of potential customers flowing from defendants' infringing activities.  
21 Pursuant to 15 U.S.C. § 1116, plaintiffs Rena and Kathryn Li are entitled to  
22 preliminary and permanent injunctive relief against defendants' continuing  
23 infringement of their registered trademarks. Unless enjoined, defendants will  
24 continue their infringing conduct.

25       50. Because defendants' actions have been committed with the intent to  
26 damage Rena and Kathryn Li and to confuse and deceive the public, Rena and  
27 Kathryn Li are entitled to recover defendants' profits, treble their actual damages, an  
28

1 award of costs, and, this being an exceptional case, reasonable attorneys' fees  
 2 pursuant to 15 U.S.C. § 1117(a).

3 **SECOND CLAIM FOR RELIEF**

4 (Common Law Trademark Infringement by Rena and Kathryn Li  
 5 against all Defendants)

6 51. Plaintiffs Rena and Kathryn Li incorporate and re-allege paragraphs 1-  
 7 50 of this Complaint.

8 52. Beginning in 2006 and continuously thereafter, plaintiffs have made  
 9 commercial use of their RENA word and design marks in interstate commerce in  
 10 connection with the manufacture and sale of their skin care, health care, and anti-  
 11 aging products as alleged herein, including their Activation Energy Serum,  
 12 Activation Mist, and Activation Energy Elixir products.

13 53. Within the market for organic, natural, ingestible anti-aging skin-care  
 14 products, the RENA word and design marks have developed exceptionally strong  
 15 goodwill and an exceptionally strong secondary meaning as identifying Rena's  
 16 products and/or as coming from a single source. For that reason, defendants have  
 17 falsely misrepresented to the trade and consuming public that they either acquired  
 18 Rena or bought formula of RENA product or somehow evolved from it.

19 54. Prior to defendants' first use of their infringing marks, defendants were  
 20 aware of plaintiffs' business and had actual notice of plaintiffs' trademarks.

21 55. Defendants' use of the purported "ARëna," "aRena," "aRENA," and  
 22 "NEW! ARËNA ACTIVATION ENERGY SERUM" marks, as well as their use of  
 23 the RENA mark itself, is likely to cause, and already has caused, confusion and  
 24 mistake, and is likely to, and has deceived Rena's sales representatives and the  
 25 consuming public as to the affiliation, connection, or association of defendants with  
 26 plaintiffs, or as to the origin, sponsorship, or approval by plaintiffs of defendants'  
 27 goods, services and commercial activities.

28

56. Defendants' use of their purported marks has enabled them to benefit unfairly from plaintiffs' reputation and success, thereby giving defendants' business a market share and commercial value that it would not otherwise enjoy.

57. Defendants' infringement of their trademarks as described herein has been and continues to be intentional, willful, and without regard for plaintiffs' rights. Plaintiffs have sustained damages as a direct and proximate result of defendants' infringement of plaintiffs' trademarks as alleged herein.

58. Plaintiffs will suffer and are suffering irreparable harm from defendants' infringement of the RENA mark insofar as plaintiffs' invaluable good will and market share is being eroded by defendants' continuing infringement. Plaintiffs have no adequate remedy at law to compensate them for the loss of business reputation, market share, sales representatives, customers, good will, and confusion of potential customers flowing from defendants' infringing activities. Plaintiffs are entitled to a preliminary and permanent injunction against defendants' continuing infringement of plaintiffs' RENA trade mark. Unless enjoined, defendants will continue their infringing conduct.

### THIRD CLAIM FOR RELIEF

(Trademark Cancellation by Rena and Kathryn Li against Lin)

(15 U.S.C. § 1064)

59. Plaintiffs Rena and Kathryn Li incorporate and re-allege paragraphs 1-58 of this Complaint.

60. Kathryn Li is the owner, and Rena the exclusive licensee, of the federally registered RENA BIOTECHNOLOGY trademark. In addition, they are the owner and licensee, respectively, of the RENA mark which, like RENA BIOTECHNOLOGY, is highly distinctive and fanciful, and enjoys a strong secondary meaning within the organic, natural anti-aging ingestible products market.

1       61. On July 26, 2011, defendant Lin obtained registration of a purported,  
2 “NEW! ARËNA ACTIVATION ENERGY SERUM” mark (the “Infringing Mark”)  
3 pursuant to Certificate of Registration No. 4,002,069 as a word and design mark for  
4 use with “body and beauty care cosmetics.”

5        62. The Infringing Mark is being used by defendants to misrepresent the  
6 source of the goods defendants sell in connection with the use of that mark.

7       63. Plaintiffs Rena and Kathryn Li are, accordingly, entitled to an order  
8 directing that the Infringing Mark be, and hereby is, canceled.

## **FOURTH CLAIM FOR RELIEF**

10 (Lanham Act Section 43(a) violation by Rena and Kathryn Li  
11 against all Defendants)  
12 (15 U.S.C. § 1125(a))

13 64. Plaintiffs Rena and Kathryn Li incorporate and re-allege paragraphs 1-  
14 63 of this Complaint.

15        65. Defendants' misconduct as alleged herein is likely to cause, and is  
16 causing, confusion between defendants' products and Rena's products in that  
17 consumers are likely to, and do, confuse defendants' products as originating or  
18 affiliated with Rena, including in that defendants have used and are using (i) the  
19 purported ARëna, aRena, aRENA and NEW! ARENA ACTIVATION ENERGY  
20 SERUM marks; (ii) Rena's RENA and RENA BIOTECHNOLOGY marks;  
21 (iii) references to the "new Rena"; (iv) photographs of Rena's owner and Chief  
22 Executive Officer; (v) a letter authored by Rena's president; (vi) brochures, fliers  
23 and websites that heavily copy the look and feel, photographs, illustrations, and  
24 textual material from Rena's brochures, fliers and website; (vii) virtually identical  
25 product bottles copied from Rena; and (viii) websites that substantially copy the  
26 content of Rena's official website.

27 66. Defendants have deliberately adopted, imitated and mimicked the trade  
28 dress and trademarks of plaintiff's products, packaging and advertising.

1 Defendants' actions have been, and are being, undertaken with the intent to deceive  
2 consumers, cause confusion and mistake, and interfere with the ability of consumers  
3 to identify the source of goods by trademark, appearance and packaging. Through  
4 their conduct, defendants unlawfully exploit the goodwill and reputation that  
5 plaintiffs Rena and Kathryn Li have developed in their marks and business and  
6 defendants are unlawfully deriving benefit therefrom.

7       67. Defendants' acts alleged herein are without the consent of plaintiffs  
8 Rena and Kathryn Li and constitute the use of terms, symbols, devices or  
9 combinations thereof that are false or misleading within the meaning of 15 U.S.C.  
10 § 1125 and are likely to cause confusion, or to cause mistake, or to deceive as to the  
11 affiliation, connection, or association, or as to the origin, sponsorship, or approval,  
12 of defendants' goods by Rena and/or Kathryn Li within the meaning of 15 U.S.C.  
13 § 1125. Defendants' actions discussed and alleged herein also constitute unfair  
14 competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).  
15 Plaintiffs have been, and are being, damaged by defendants' acts.

16       68. Defendants' conduct has been intentional and willful, and is  
17 specifically calculated to trade on the goodwill that plaintiffs Rena and Kathryn Li  
18 have developed in their successful RENA BIOTECHNOLOGY products. By the  
19 aforesaid acts, including without limitation the deliberate use of Rena's unique and  
20 distinctive bottle trade dress, repeated references to "Rena" products, and use of  
21 written and photographic elements portraying Rena's owner and Chief Executive  
22 Officer in connection with goods sold and distributed in interstate commerce,  
23 defendants have infringed, and are likely to continue to infringe, plaintiffs' rights in  
24 their RENA and RENA BIOTECHNOLOGY products.

25       69. Plaintiffs Rena and Kathryn Li have been damaged by, and defendants  
26 have profited from, defendants' wrongful conduct in an amount to be proven at trial.  
27  
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1       70. For each act of infringement, plaintiffs Rena and Kathryn Li are  
2 entitled to recover their actual damages as well as defendants' profits from such  
3 infringement.

4 71. Plaintiffs are suffering and will suffer irreparable harm from  
5 defendants' acts of false designation of origin or affiliation. Plaintiffs also have  
6 been, and will continue to be, irreparably harmed and damaged by defendants'  
7 conduct in that their invaluable goodwill is being eroded by defendants' continuing  
8 acts of infringement. Plaintiffs have no adequate remedy at law to compensate them  
9 for the loss of business reputation, customers, market position, goodwill, and  
10 confusion of potential customers flowing from defendants' unlawful activities.  
11 Plaintiffs are therefore entitled to preliminary and permanent injunctive relief to stop  
12 defendants' continuing acts of false designation of origin or affiliation and  
13 continued infringement of the Activation Energy Serum bottle trade dress, product  
14 brochures, product fliers, website, and trademarks.

15       72. Because defendants' actions have been committed with the intent to  
16 damage plaintiffs Rena and Kathryn Li and to confuse and deceive the public,  
17 plaintiffs are entitled to recover treble or actual damages, and award of costs, and,  
18 this being an exceptional case, reasonable attorneys' fees pursuant to 15 U.S.C.  
19 § 1117(a).

## **FIFTH CLAIM FOR RELIEF**

(Copyright Infringement by Rena against all Defendants)

22 || 73. Rena incorporates and re-alleges paragraphs 1-72 of this Complaint.

23       74. Rena is the owner of valid copyrights in works that are fixed in tangible  
24 media of expression, including in its website. These copyrights include, without  
25 limitation, those that are the subject of registration numbers TXu 1-815-587 and  
26 TXu 1-815-464.

27 75. Defendants Sis-Joyce, Lin, Wu and DOES 1-10 have reproduced,  
28 created derivative works from and otherwise infringed upon Rena's exclusive rights

1 in its protected works without Rena's authorization. Defendants' acts violate Rena's  
2 exclusive rights under the Copyright Act, including without limitation Rena's  
3 exclusive rights to reproduce its copyrighted works and to create derivative works  
4 from its copyrighted works, as set forth in 17 U.S.C. §§ 106 and 501.

5       76. Defendants' infringement (and substantial contributions to the  
6 infringement) of Rena's copyrighted works is and has been knowingly made without  
7 Rena's consent and for commercial purposes and the direct financial benefit of  
8 defendants. On information and belief, defendants also have deliberately failed to  
9 exercise their right and ability to supervise the infringing activities of others within  
10 their control to refrain from infringing Rena's copyrighted works and have failed to  
11 do so in order to deliberately further their significant financial interest in the  
12 infringement of Rena's copyrighted works. Accordingly, defendants have engaged  
13 in direct, contributory and vicarious infringement of Rena's copyrighted works.

14       77. Defendants' infringement of Rena's copyrighted works has been willful  
15 and intentional, engaged in with no regard for Rena's lawful rights.

16       78. By virtue of defendants' infringing acts, Rena is entitled to recover its  
17 actual damages plus defendants' profits, its costs of suit and attorneys' fees,  
18 statutory damages, punitive damages, and all other relief permitted under the  
19 Copyright Act.

20       79. Defendants' actions have caused and will continue to cause irreparable  
21 damage to Rena, for which Rena has no remedy at law. Unless defendants are  
22 restrained from continuing their infringement of Rena's copyrights, these injuries  
23 will continue to occur in the future. Accordingly, Rena is entitled to preliminary  
24 and permanent injunctive relief restraining defendants from further infringement.

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## **SIXTH CLAIM FOR RELIEF**

(Anticybersquatting Consumer Protection Act Violation by Rena and Kathryn Li  
against all Defendants)  
(15 U.S.C. § 1125(d))

80. Rena and Kathryn Li incorporate and re-allege paragraphs 1-79 of this Complaint.

7 81. Kathryn Li's and Rena's RENA and RENA BIOTECHNOLOGY  
8 marks were distinctive when Defendants registered their www.RenaSkin.com and  
9 www.ArenaSkin.com domain names (the "Cyberpirated Domain Names").

10 82. The Cyberpirated Domain Names are confusingly similar to Rena's and  
11 Kathryn Li's RENA and RENA BIOTECHNOLOGY trademarks used for skincare  
12 products.

13       83. Defendants registered their domain names in a bad faith attempt to  
14 profit from the RENA and RENA BIOTECHNOLOGY marks, as evidenced by  
15 (i) defendants' deliberate attempt to create confusion with Rena's products through  
16 defendants' deliberate references to "American Rena" calculated to cause confusion  
17 among Internet users familiar with Rena's [www.AmericanRena.com](http://www.AmericanRena.com) website;  
18 (ii) the fact that defendants' domain names do not consist of defendants' legal  
19 names or names by which they are otherwise commonly identified; (iii) defendants'  
20 lack of any prior use of their domain names in connection with a bona fide offering  
21 of any goods or services; (iv) defendants' lack of any bona fide noncommercial or  
22 fair use of the RENA or RENA BIOTECHNOLOGY marks in a site accessible  
23 under their domain names; (v) defendants' intent to divert consumers from Rena's  
24 online location to sites accessible under their domain names that can harm, and are  
25 harming, the goodwill represented by the RENA and RENA BIOTECHNOLOGY  
26 marks for commercial gain by creating a likelihood of confusion as to the source,  
27 sponsorship, affiliation, or endorsement of defendants' sites; and (vi) defendants'  
28 provision of material and misleading false contact information when applying to

1 register their domain names and their intentional failure to maintain accurate contact  
2 information.

3 84. Defendants had and have no reasonable grounds to believe that their  
4 uses of the Cyberpirated Domain Names are fair uses or otherwise lawful.

5       85.    Rena and Kathryn Li are therefore entitled to the entry of an order of  
6 forfeiture or cancellation of the Cyberpirated Domain Names or requiring the  
7 transfer of the domain names to Kathryn Li.

8        86. Pursuant to Section 35 of the Lanham Act, 15 U.S.C. § 1117, plaintiffs  
9        Rena and Kathryn Li are entitled to an award of statutory damages of \$100,000  
10        against Lin, and against Wu, or, in the alternative, to recover defendants' profits, all  
11        damages sustained by Rena and Kathryn Li, and costs of the action and, this being  
12        an exceptional case, reasonable attorneys' fees.

## SEVENTH CLAIM FOR RELIEF

(Trade Secret Misappropriation by Rena against all Defendants)

87. Rena incorporates and re-alleges Paragraphs 1-86 of this Complaint.

16       88. Prior to defendants' unlawful acts complained of herein, Rena had a  
17 multi-tiered sales organization comprising nearly 100,000 independent sales agents  
18 worldwide. The structure of Rena's sales force can be roughly analogized to that of  
19 an army in which a large number of privates report to a somewhat smaller number  
20 of sergeants who report to a somewhat smaller number of lieutenants who report to a  
21 somewhat smaller number of captains who report to fewer colonels who, in turn,  
22 report to still fewer generals. In such a structure, higher ranking officers exercise  
23 control, either directly or indirectly, of more persons than are controlled by lower  
24 ranking officers. Similarly, in a multi-tiered sales force, persons in the higher tiers  
25 have control of more sales personnel than persons in lower tiers enjoy.

26 89. For this reason, the identities and locations of Rena's sales  
27 representatives within its multi-level sales structure is a closely-guarded trade secret.  
28 The identities of the persons in the upper levels of Rena's sales structure and

knowledge of the identities of the sales persons subordinate to each of them would obviously be extremely valuable to any person or entity seeking to compete in the marketplace with Rena. For that reason, Rena has always exercised reasonable efforts to protect the secrecy of the identities of the persons in its sales structure and, until recently, that information had never been known or available to any competitor of Rena or to any person or entity that could derive financial benefit from its disclosure or use.

8        90. As persons who enjoyed positions of trust and confidence within  
9 Rena's sales force, defendants Lin and Wu understood that such information was  
10 highly confidential and trade secret and was disclosed to them under circumstances  
11 giving rise to a duty to maintain the secrecy, and limit the use, of such information.

12        91. In derogation of their obligation to maintain the secrecy of Rena's  
13 100,000-person sales organization, Lin and Wu have, instead, used and are using  
14 such information for the benefit of Sis-Joyce and have now poached a very  
15 substantial portion of Rena's sales force. Accordingly, Rena is entitled to the entry  
16 of an injunction prohibiting further use of its trade secrets; a preliminary and  
17 permanent injunction prohibiting Sis-Joyce, Lin and Wu from continuing to benefit  
18 from their misappropriation of Rena's trade secrets; an award of Rena's actual loss  
19 caused by the misappropriation; an award of defendants' unjust enrichment caused  
20 by the misappropriation and not taken into account in computing the damages for  
21 actual loss; an award of exemplary damages based on defendants' willful and  
22 malicious misappropriation of Rena's trade secrets; and an award of reasonable  
23 attorneys' fees and costs.

## **EIGHTH CLAIM FOR RELIEF**

## (Interference with Prospective Economic Advantage by Rena against all Defendants)

27 92. Rena incorporates and re-alleges Paragraphs 1-91 of this Complaint.

1       93. Rena's economic relationships with its 100,000-member sales force  
2 provided prospective economic benefits for Rena.

3       94. Defendants knew and should have known of Rena's economic  
4 relationships with its sales representatives and that those economic relationships  
5 provided prospective economic benefits for Rena.

6       95. Defendants committed intentional acts that were designed, and which  
7 they knew and should have known were substantially likely, to result in a disruption  
8 of Rena's business and to impose a burden upon Rena's economic relationships with  
9 its sales representatives. Those actions were independently wrongful and included,  
10 without limitation, the use of false representations that Rena had been acquired by  
11 Sis-Joyce and/or "ARëna;" false representations that Rena had become "ARëna;"  
12 and the use of Rena's highly confidential and trade secret information concerning  
13 the identities and levels of the persons in its 100,000-person, multi-level sales force.

14       96. But for the conduct of defendants, Rena's economic relationships with  
15 its sales force would have resulted in economic benefits to Rena.

16       97. As a result of the aforementioned conduct, Rena suffered damages in  
17 an amount to be proved at trial, but which include the loss of customers, sales  
18 representatives, sales, good will, and valuable proprietary and trade secret  
19 information. Moreover, Defendants' misconduct will continue unabated barring  
20 relief, and Rena is therefore entitled to preliminary and permanent injunctive relief  
21 to prevent further such misconduct.

22       98. The aforementioned conduct was despicable, wanton, oppressive,  
23 malicious, duplicitous, and performed with willful and conscious disregard of  
24 Rena's rights and with the intent to deprive Rena of those rights. Accordingly, Rena  
25 is entitled to an award of punitive and exemplary damages.

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## NINTH CLAIM FOR RELIEF

(Trade Libel by Rena against all Defendants)

3 99. Plaintiff Rena incorporates and re-alleges Paragraphs 1-98 of this  
4 Complaint.

5        100. Defendants have each individually and in combination made statements  
6 concerning Rena's ownership, existence, corporate name, trademarks, products and  
7 customers that were false, inaccurate, misleading, deceptive and untrue.

8       101. Defendants knew that such statements were false, inaccurate,  
9 misleading, deceptive and untrue and knew and acted with reckless disregard of the  
10 truth of those statements, both at the times the statements were made and thereafter.

11 102. As a direct and proximate result of such statements, Rena's customers,  
12 sales representatives, and accounts had been induced to cease, reduce, or diminish  
13 their business relationships, dealings, and orders placed with Rena.

14 103. As a result of the aforementioned conduct, Rena has suffered damages  
15 in an amount which has not yet been ascertained but which includes the loss of  
16 Rena's customers, sales representatives, sales, and good will.

17       104. The aforementioned conduct was despicable, wanton, oppressive,  
18 malicious, duplicitous, and performed with willful and conscious disregard of  
19 Rena's rights and with the intent to deprive Rena of its rights. Accordingly, Rena is  
20 entitled to an award of punitive and exemplary damages.

## TENTH CLAIM FOR RELIEF

(False Light Invasion of Privacy by Kathryn Li and Robert Milliken  
against all Defendants)

24 105. Plaintiffs Kathryn Li and Robert Milliken incorporate and re-allege  
25 paragraphs 1-104 of this Complaint.

106. Defendants' use of photographs of plaintiffs Kathryn Li and Robert  
Milliken, as well as the use of the letter signed by Mr. Milliken, on websites  
advertising and promoting defendants' purported "ARëna" products constitutes a

1 calculated falsehood intended to deceive persons viewing the websites into believing  
2 that plaintiffs have somehow sponsored, endorsed, produced, or approved  
3 defendants' products.

4 107. In appropriating plaintiffs' likenesses, correspondence, and names,  
5 defendants have acted with actual malice in falsely portraying plaintiffs as having  
6 created or approved defendants' products when, in fact, the opposite is true.  
7 Defendants' misappropriation of plaintiffs' images, names, and letter was done  
8 maliciously as part of a calculated scheme to misappropriate plaintiffs' business by  
9 confusing and misleading plaintiffs' sales leaders, sales representatives, customers,  
10 and consumers of natural, organic topical and ingestible skin care products.

11       108. The above invasion of plaintiffs' privacy was wrongful and has caused  
12 both humiliation and financial harm to plaintiffs.

13       109. The acts alleged above were performed without plaintiffs' consent and  
14 resulted in damage to plaintiffs in an amount to be proved at trial. Plaintiffs are also  
15 entitled to profits attributable to defendants' unauthorized use of their likenesses,  
16 names and letter.

17       110. Upon information and belief, defendants have engaged in the conduct  
18 alleged above with oppression, fraud and malice. Accordingly, plaintiffs are entitled  
19 to an award of punitive and exemplary damages in an amount to be proved at trial.

## **ELEVENTH CLAIM FOR RELIEF**

21 (Violation of Right of Publicity by Kathryn Li and Robert Milliken  
22 against all Defendants)

23 (California Civil Code § 3344 and the Common Law)

24 111. Plaintiffs Kathryn Li and Robert Milliken incorporate and re-allege  
25 paragraphs 1-110 of this Complaint.

112. Through their talent and hard work developing natural, organic topical  
and ingestible skin care products, plaintiffs Kathryn Li and Robert Milliken have  
developed and earned considerable good will and commercial value in their names.

1 images, and likenesses among persons selling, distributing and purchasing natural,  
2 organic topical and ingestible skin care products. Their likenesses convey a sense of  
3 integrity and scientific accomplishment.

4 113. Plaintiffs never agreed to allow the use of their names or likenesses in  
5 connection with the marketing, advertising, distribution or sale of defendants'  
6 products.

7 114. By using plaintiffs' names and likenesses in conjunction with the  
8 advertising of their products, defendants have knowingly misappropriated plaintiffs'  
9 names and likenesses for commercial gain.

10 115. The acts alleged above constitute a violation of *California Civil Code*  
11 § 3344 and plaintiffs' common law right of publicity.

12 116. As a direct and proximate result of defendants' acts alleged above,  
13 plaintiffs have been damaged in an amount to be proved at trial. Plaintiffs are also  
14 entitled to all profits attributable to defendants' unauthorized use of their names and  
15 likenesses.

16 117. Pursuant to *California Civil Code* § 3344(a), plaintiffs are also entitled  
17 to recover reasonable attorneys' fees.

18 118. Upon information and belief, defendants have engaged in the conduct  
19 alleged above with oppression, fraud and malice. Accordingly, plaintiffs are entitled  
20 to an award of punitive and exemplary damages in an amount to be proved at trial.

21 **TWELFTH CLAIM FOR RELIEF**

22 (California Statutory Unfair Competition by Rena against all Defendants)

23 119. Plaintiff Rena incorporates and re-alleges paragraphs 1-118 of this  
24 Complaint.

25 120. Defendants' acts described above constitute fraudulent and unlawful  
26 business practices as defined by *California Business & Profession Code* § 17200  
27 et seq.

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1       121. Plaintiffs have valuable and protectable rights in their RENA and  
2 RENA BIOTECHNOLOGY word and design marks. Those marks are inherently  
3 distinctive, and, through plaintiffs' use, have come to be associated in the market  
4 solely with Rena, which is well known as the source of the products on which they  
5 are used.

6       122. Defendants' sale of their infringing products is likely to cause  
7 confusion as to the source of their Activation Energy Serum, and other products, and  
8 is likely to cause consumers and sales representatives to be confused or mistaken  
9 into believing that there is a relationship between defendants and Rena, or that  
10 defendants' products are affiliated with or sponsored by Rena.

11       123. Defendants' use of deceptively similar Internet domain names for sites  
12 that are copied heavily from and derivative of Rena's official website is likely to  
13 cause others to be confused or mistaken into believing that there is a relationship  
14 between defendants and Rena, or that defendants' products are affiliated with, or  
15 sponsored by, Rena. The fraudulent business practices of Defendants, including  
16 their cybersquatting of domain names, infringement of Rena's copyrighted  
17 materials, theft and use of Rena's trade secret information, and intentional  
18 interference with Rena's prospective economic advantage further constitute unfair  
19 competition and fraudulent business practices.

20       124. As a direct and proximate result of defendants' wrongful conduct, Rena  
21 and Kathryn Li have been injured in fact, and have lost money and profits, and such  
22 harm will continue unless defendants' acts are enjoined by the Court. Rena and  
23 Kathryn Li have no adequate remedy at law for defendants' continuing violation of  
24 their rights.

25       125. Defendants should be required to restore to Rena and Kathryn Li any  
26 and all profits earned as a result of their unlawful and fraudulent actions, or provide  
27 Rena and Kathryn Li with any other restitution or relief as the Court deems  
28 appropriate.

## **THIRTEENTH CLAIM FOR RELIEF**

(California Common Law Unfair Competition by Rena against all Defendants)

126. Plaintiff Rena incorporates and re-alleges paragraphs 1-125 of this Complaint.

127. Plaintiff's genuine RENA products have acquired a secondary meaning among leaders, sales representatives, and consumers in the natural, organic topical and ingestible skin care products market as associated with, and emanating from, Rena.

128. Defendants, through the marketing of their directly competing products, have unfairly imitated the name and appearance of Rena's products and, in doing so, have competed unfairly with Rena.

129. Rena is, therefore, entitled to an award of its actual damages and, because defendants acted with oppression, fraud, and malice, Rena is further entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

## **FOURTEENTH CLAIM FOR RELIEF**

(Violation of the Racketeer Influenced and Corrupt Organizations Act

by Rena against all Defendants)

(18 U.S.C. §§ 1962(c) and 1964(c))

130. Plaintiff Rena incorporates and re-alleges paragraphs 1-129 of this Complaint.

131. Beginning from approximately 2008 through the filing of this Complaint, and continuing into the future, in the Central District of California and elsewhere, Defendants Wu, Lin and Does 1-10 have, directly and indirectly, knowingly participated in the conduct of, and operated and managed, Sis-Joyce, an enterprise by which they are employed or associated and whose conduct and activities affect interstate or foreign commerce (the “Criminal Enterprise”), through a pattern of racketeering activity, and in so doing injured Rena in its business and property. Defendants’ actions include multiple, related acts in violation of:

1 18 U.S.C. § 1341 (mail fraud), 18 U.S.C. § 1343 (wire fraud), 18 U.S.C. § 2319(a)  
 2 and 17 U.S.C. § 506(a) (criminal copyright infringement), 18 U.S.C. § 2320  
 3 (trafficking in counterfeit goods).

4 132. The predicate acts alleged herein occurred after the effective date of 18  
 5 U.S.C. §§ 1961 et seq., and the last such act occurred within 10 years after the  
 6 commission of a prior act of racketeering activity. These racketeering activities  
 7 include repeated acts of:

8 (a) Criminal Copyright Infringement. Defendants Lin, Wu  
 9 and Does 1-10 willfully infringed and continue to willfully infringe Rena's  
 10 copyrights, including without limitation with respect to copyrighted material on the  
 11 AmericanRena.com website, for purposes of commercial advantage and private  
 12 financial gain, all in violation of 18 U.S.C. § 2319(a) and 17 U.S.C. § 506(a)(1)(a),  
 13 (c), as alleged with greater particularity in the foregoing paragraphs.

14 (b) Trafficking in Counterfeit Goods. Defendants Lin, Wu  
 15 and Does 1-10 intentionally trafficked and continue to intentionally traffic in goods  
 16 while knowingly using a counterfeit mark on and in connection with such goods,  
 17 and attempted and conspired to do so, including by selling non-genuine products  
 18 bearing the RENA and RENA BIOTECHNOLOGY marks and by using the RENA  
 19 and RENA BIOTECHNOLOGY marks, including on packaging, to sell goods  
 20 bearing the "ARena" label in a manner likely to deceive and cause mistake and  
 21 confusion, all in violation of 18 U.S.C. § 2320(a)(1, 2), as alleged with greater  
 22 particularity in the foregoing paragraphs.

23 (c) Mail and Wire Fraud. The Criminal Enterprise was and is  
 24 engaged in a scheme to defraud involving the conduct set forth herein, including by  
 25 willfully infringing Rena's intellectual property rights, counterfeiting Rena's goods,  
 26 misleading consumers and making false and fraudulent statements to Rena  
 27 members, including on the Internet, all in an effort to unlawfully hijack Rena's  
 28 business, property and rights. Defendants Lin, Wu and Does 1-10, having devised

1 such a scheme to defraud, did for the purpose of furthering and executing this  
 2 scheme transmit and cause to be transmitted by means of wire communications in  
 3 interstate or foreign commerce, writing, signs, signals, pictures and sound, and  
 4 deposit or cause to be deposited matters or things to be sent or delivered by mail and  
 5 by commercial interstate carriers, and take or receive matters or things therefrom, in  
 6 violation of 18 U.S.C. § 1341, 18 U.S.C. § 1343, 18 U.S.C. § 1346, and 18 U.S.C.  
 7 § 2, including without limitation by transmitting documents in furtherance of the  
 8 fraudulent scheme including the email messages attached hereto as Exhibit A, by  
 9 providing false information when registering the fraudulent and infringing  
 10 renaskin.com website, by causing the publication on the Internet of the fraudulent  
 11 and infringing renaskin.com and arenaskin.com websites that among other things  
 12 make counterfeit use of the RENA and RENA BIOTECHNOLOGY marks, by  
 13 willfully infringing Rena's copyrights and falsely purporting to advertise and sell  
 14 "Genuine American Rena" products, and by causing the publication on YouTube of  
 15 fraudulent and infringing videos, uploaded under the name "tvstripe1" on or about  
 16 June 2, 2010 and August 25, 2011, that among other things make counterfeit use of  
 17 the RENA and RENA BIOTECHNOLOGY marks and products and purport to  
 18 advertise and sell genuine American Rena products, but direct consumers to the  
 19 fraudulent and infringing renaskin.com website.

20       133. Rena has been injured in its business or property as a direct and  
 21 proximate result of Defendants' violations of 18 U.S.C. § 1962(c), including injury  
 22 by reason of the predicate acts constituting the pattern of racketeering activity, as  
 23 alleged with greater particularity in the foregoing paragraphs.

24       134. As a result of Defendants' violations of 18 U.S.C. § 1962(c), Rena has  
 25 suffered substantial damages, in an amount to be proved at trial. Pursuant to 18  
 26 U.S.C. § 1964(c), Rena is entitled to recover treble its general and special  
 27 compensatory damages, plus interest, costs and attorneys fees, incurred by reason of  
 28 Defendants' violations of 18 U.S.C. § 1962(c).

## **FIFTEENTH CLAIM FOR RELIEF**

(Conspiracy to Violate the Racketeer Influenced and Corrupt Organizations Act  
by Rena against all Defendants)  
(18 U.S.C. §§ 1962(d) and 1964(c))

135. Plaintiff Rena incorporates and re-alleges paragraphs 1-134 of this Complaint.

7       136. Beginning from approximately 2008 through the filing of this  
8 Complaint, and continuing into the future, in the Central District of California and  
9 elsewhere, Defendants Lin, Wu, Does 1-10 and others acting in concert with or on  
10 behalf of them, knowingly, willfully, and unlawfully, did conspire, combine,  
11 confederate and agree together to violate 18 U.S.C. § 1962(d) by furthering,  
12 promoting, and facilitating the Criminal Enterprise as detailed above, in violation of  
13 18 U.S.C. § 1962(c).

14        137. In furtherance of this unlawful conspiracy and its multiple objects, as  
15    alleged herein, Defendants Lin, Wu, and various co-conspirators committed  
16    numerous overt acts, including but not limited to those set forth above.

17       138. Rena has been injured in its business or property as a direct and  
18 proximate result of Defendants' violations of 18 U.S.C. § 1962(d), including injury  
19 by reason of the predicate acts constituting the pattern of racketeering activity. As a  
20 result of the conspiracy between and among Defendants to violate 18 U.S.C.  
21 § 1962(c), Rena has suffered substantial damages, in an amount to be proved at trial.  
22 Pursuant to 18 U.S.C. § 1964(c), Rena is entitled to recover treble its general and  
23 special compensatory damages, plus interest, costs and attorneys fees, incurred by  
24 reason of Counter-defendants' violations of 18 U.S.C. § 1962(d).

## SIXTEENTH CLAIM FOR RELIEF

(Unjust Enrichment by Rena against all Defendants)

27 139. Plaintiff Rena incorporates and re-alleges paragraphs 1-138 of this  
28 Complaint.

1       140. As a direct and proximate result of the misconduct set forth above,  
2 defendants have been unjustly enriched, to Rena's detriment. Rena seeks a  
3 worldwide accounting and disgorgement of all ill-gotten gains and profits resulting  
4 from defendants' inequitable activities.

## PRAYER FOR RELIEF

6 WHEREFORE, plaintiffs American Rena International Corp., WanZhu,  
7 "Kathryn" Li and Robert M. Milliken demand judgment:

8       1.    That defendants, their agents, servants and employees, and all persons  
9 acting in concert with them, be preliminarily and permanently enjoined from  
10 engaging in the unlawful conduct set forth herein, including in that they be enjoined  
11 from, directly or indirectly infringing plaintiff Rena's RENA and RENA  
12 BIOTECHNOLOGY trademarks; making any commercial use or use in commerce  
13 of or references to the RENA or RENA BIOTECHNOLOGY marks; making any  
14 commercial use or use in commerce of or references to the "ARëna," "aRena,"  
15 "aRENA," or "NEW! ARËNA ACTIVATION ENERGY SERUM" marks; making  
16 any commercial use or use in commerce of or references to "New Rena" or "Rena;"  
17 making any commercial use or use in commerce of or references to photographs or  
18 images of plaintiffs Li and/or Milliken; making any commercial use or use in  
19 commerce of or references to any of Rena's copyrighted materials, including those  
20 materials that appear on the AmericanRena.com website; making any commercial  
21 use or use in commerce of or references to any brochures, fliers, or websites that  
22 misappropriate the content or use any photographs, illustrations, or textual material,  
23 or that copy the look and feel, of Rena's brochures, fliers and website; making any  
24 commercial use or use in commerce of or references to product bottles or containers  
25 that are confusingly similar to product bottles or containers used by Rena, or any  
26 trade dress employed by Rena; and from otherwise engaging in unfair competition  
27 with Rena or interfering improperly with any prospective economic advantage

1 enjoyed by Rena, including by providing misleading or false information to Rena  
2 customers.

3       2. An order directing the United States Patent and Trademark Office to  
4 cancel the purported “NEW! RENA ACTIVATION ENERGY SERUM” mark  
5 registered pursuant to Certificate of Registration No. 4,002,069.

6       3. An order directed to Network Solutions. Inc., directing that ownership  
7 of the [www.Renaskin.com](http://www.Renaskin.com) and [www.Arenaskin.com](http://www.Arenaskin.com) domain names be transferred  
8 to Li.

9       4. That plaintiffs Li and Milliken be awarded damages for the false-light  
10 invasions of their privacy and violations of their rights of publicity.

11       5. That Rena recover its actual damages and lost profits, and that it be  
12 awarded an amount equal to defendants’ unjust enrichment to the extent that such  
13 unjust enrichment is not reflected in the award of damages, and that a constructive  
14 trust in favor of Rena be imposed over defendants’ ill-gotten gains and profits.

15       6. That defendants be ordered to pay punitive and exemplary damages in a  
16 sum sufficient to punish and make an example of them, and deter them and others  
17 from similar wrongdoing.

18       7. That defendants be ordered to pay double damages due to their willful  
19 and malicious misappropriation of Rena’s trade secrets.

20       8. That defendants be ordered to pay trebled general and special damages,  
21 together with interest thereon, costs and attorneys’ fees, incurred by reason of their  
22 violations of 18 U.S.C. §§ 1962(c) - (d).

23       9. That defendants pay to plaintiffs the full cost of this action and  
24 plaintiffs’ attorneys’ fees and investigator’s fees.

25       10. That plaintiffs have such other and further relief as the Court may deem  
26 just and proper.

27

28

1 DATED: August 13, 2012

2  
3  
4 QUINN EMANUEL URQUHART &  
5 SULLIVAN, LLP  
6 Bruce E. Van Dalsem  
7 David W. Quinto  
8 B. Dylan Proctor

9  
10 By 

11 Bruce E. Van Dalsem

12 David W. Quinto

13 Attorneys for American Rena International  
14 Corp., WanZhu "Kathryn" Li, and Robert  
15 M. Milliken

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IT

----- Forwarded Message -----

**From:** virginia wu <[virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com)>  
**To:** [virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com)  
**Sent:** Sunday, February 13, 2011 12:51 AM  
**Subject:** New Rena Company is lunched

**Dear Arena gold members,**

**Bank: CHASE BANK**

**SWift code: CHASUS33**  
**Account: 946067170**  
**Company: Sis-Joyce International Co.LTD**

**New Rena product has arrived. The product name called Arena. Company will open on the end of the February. Member can reorder the product now.**

Please deposit the premium of US\$1527.39 (No Tax - Promotion) to the above Bank account. and email to me [virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com) for indicating the member's old ID#, Name, Tel#, Address. Company will ship the order to your address. Package including 10 bottles of concentrate and 2 empty bottles. The member in out of state will receive 11 bottles of concentrate.

I will provide all the member's order record to the Company. When the Company computer system are ready around begining of the March, All member's commission will be paid.

So, please grab this chance, I believe we can do better, bigger and easier at this time. Any questions please call me or email me. Thank you. 626-329-3991

在加州的會員訂貨須知:

10瓶50倍的濃縮液，沒有外面的紙合包裝，加上二瓶30ml的能量空瓶。  
外面的紙合包裝以後會補發給會員。

目前促銷中，含稅只須付 US\$ 1,527.39元. 請直接存入上面的Account. 存完後請 E-mail給[virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com) 請告知您在舊的ID號碼#，姓名，電話，及郵寄地址。公司馬上會把貨郵寄到您要的地址，必須要有人簽收。

外州及其它國家的會員訂貨須知:

11瓶50倍的濃縮液，沒有外面的紙合包裝，加上二瓶30ml的能量空瓶。

外面的紙合包裝以後會補發給會員.

目前促銷中. 只須付 US\$ 1,527.39元.(就多了一瓶) 請直接存入上面的Account.  
存完後請 E-mail給 [virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com) 請告知您在的舊ID號碼 #,  
姓名, 電話, 及郵寄地址. 公司馬上會把貨郵寄到您要的地址, 必須要有人簽收.

讓我集合在一起報備給公司, 待電腦系統都完成後, 公司馬上會把獎金撥下來.

**Best regard,**  
**Virginia Wu**  
**626-329-3991**

**EXHIBIT A**

IT

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----- Forwarded Message -----

**From:** virginia wu <[virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com)>  
**To:** Margaux Cheng <[regency898@yahoo.com.tw](mailto:regency898@yahoo.com.tw)>; ROB SIMONE <[robsimonetalks@yahoo.com](mailto:robsimonetalks@yahoo.com)>; Lisa Canada <[lisa\\_ma@yahoo.com](mailto:lisa_ma@yahoo.com)>  
**Cc:** Kavina Chang <[globalfreestore@yahoo.com](mailto:globalfreestore@yahoo.com)>; Simon Ma Rena <[simonma7@yahoo.com](mailto:simonma7@yahoo.com)>  
**Sent:** Wednesday, March 16, 2011 11:42 AM  
**Subject:** Arena needs your information

Dear all,

It is good to hear that Arena ( 2nd generation of Rena) is finally open for our members. Now all we need to do is go to the back office key in your personal information. Later we will notify you how to activate your account for the member who has ordered product.

Go to [sisjoyce.com](http://sisjoyce.com)

go to office => member log in ( please add 6 before your member ID and password )  
go to Manage my account => Personal information (Rember ID# is your Social Security #)

Please call me if you have any questions.

Have a good day  
Virginia

## EXHIBIT A

IT

----- Forwarded Message -----

**From:** virginia wu <[virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com)>  
**To:** ROB SIMONE <[robsimonetalks@yahoo.com](mailto:robsimonetalks@yahoo.com)>; Lisa Canada <[lisa\\_ma@yahoo.com](mailto:lisa_ma@yahoo.com)>; Jane Wang Rena <[tojxw@yahoo.com](mailto:tojxw@yahoo.com)>; Kavina Chang <[globalfreestore@yahoo.com](mailto:globalfreestore@yahoo.com)>; Tina Rena <[tinalee4rena@yahoo.com](mailto:tinalee4rena@yahoo.com)>; Vanessa Canada <[vanessawong\\_ca@yahoo.ca](mailto:vanessawong_ca@yahoo.ca)>; Wendy Li Rena <[syli233@hotmail.com](mailto:syli233@hotmail.com)>; Margaux Cheng <[cregency898@yahoo.com.tw](mailto:cregency898@yahoo.com.tw)>  
**Sent:** Monday, February 21, 2011 12:54 AM  
**Subject:** Fw: Re : Very Exciting Update News !

**Dear All Members :**

**The Top Leader, Annie Lin**

**She has very exciting news for everyone!**

**On the Feb-26-11 Pm 3:00-6:00**

**Feb-27-11 Pm 1:00-5:00**

**All members that attend will receive complementary gifts and also be eligible for a raffle for the patented micro-molecular Activation energy bottle.**

**Special thanks to Alice Hsu for providing us with the meeting location!**

感謝我們的大 Leader Annie Lin 將專程給我們帶來令人興奮的好消息。  
會議的時間如下。

**2月26日Pm 3:00-6:00**

**2月27日Pm 1:00-5:00**

**我們有抽獎活動，獎品非常豐富，達到千元以上。  
其中包括有專利的能量瓶。**

**EXHIBIT A**

所有來的會員將都會有禮物贈送。

我們特別在此感謝Alice Hsu她提供我們會議場所。

**Address Located:** 聖約翰美容學院

**9526 Las Tunas Dr  
Temple City CA 91780**

On Las Tunas between Temple city & Rosemead .  
It is located on primrose Ave right in front  
of the Mandarin Noodle Deli.

Best Regard  
Virginia

**EXHIBIT A**

--- On Sun, 6/12/11, Annie Lin <[annierenausa@yahoo.com](mailto:annierenausa@yahoo.com)> wrote:

From: Annie Lin <[annierenausa@yahoo.com](mailto:annierenausa@yahoo.com)>  
Subject: Fw: New Powerpoints  
To: "Simon Ma" <[simonma7@yahoo.com](mailto:simonma7@yahoo.com)>, [virginiachu7@yahoo.com](mailto:virginiachu7@yahoo.com), "Christine Ko" <[arenausa7@yahoo.com](mailto:arenausa7@yahoo.com)>  
Date: Sunday, June 12, 2011, 2:34 PM

--- On Sun, 6/12/11, Annie Lin <[annierenausa@yahoo.com](mailto:annierenausa@yahoo.com)> wrote:

From: Annie Lin <[annierenausa@yahoo.com](mailto:annierenausa@yahoo.com)>  
Subject: New Powerpoints

**EXHIBIT A**

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself )

American Rena International Corp., a California corporation; Wanzhu "Kathryn" Li, an individual; and Robert M. Milliken, an individual,

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Bruce E. Van Dalsem (Bar No. 124128)  
David W. Quinto, (Bar No. 106232)  
B. Dylan Proctor (Bar No. 219354)  
865 S. Figueroa St., 10th Floor  
Los Angeles, CA 90017 - 213/443-3000

## DEFENDANTS

Sis-Joyce International Co., Ltd., a California corporation; Alice "Annie" Lin, an individual; Virgina Wu, an individual; and Does 1 - 10,

## II. BASIS OF JURISDICTION (Place an X in one box only.)

1 U.S. Government Plaintiff  3 Federal Question (U.S. Government Not a Party)  
 2 U.S. Government Defendant  4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF	PTF	DEF
Citizen of This State	<input checked="" data-bbox="931 595 956 627" type="checkbox"/> 1	<input checked="" data-bbox="980 595 1005 627" type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input checked="" data-bbox="1388 595 1413 627" type="checkbox"/> 4 <input checked="" data-bbox="1429 595 1454 627" type="checkbox"/> 4
Citizen of Another State	<input data-bbox="931 667 956 699" type="checkbox"/> 2	<input data-bbox="980 667 1005 699" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input data-bbox="1388 667 1413 699" type="checkbox"/> 5 <input data-bbox="1429 667 1454 699" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input data-bbox="931 730 956 762" type="checkbox"/> 3	<input data-bbox="980 730 1005 762" type="checkbox"/> 3	Foreign Nation	<input data-bbox="1388 730 1413 762" type="checkbox"/> 6 <input data-bbox="1429 730 1454 762" type="checkbox"/> 6

## IV. ORIGIN (Place an X in one box only.)

1 Original  2 Removed from  3 Remanded from  4 Reinstated or  5 Transferred from another district  6 Multi-District Litigation  7 Appeal to District Judge from Magistrate Judge  
Proceeding State Court Appellate Court Reopened (specify):

V. REQUESTED IN COMPLAINT: JURY DEMAND:  Yes  No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23:  Yes  No MONEY DEMANDED IN COMPLAINT: \$ Amount to be proved

## VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Lanham Trademark Act, 15 U.S.C. §1116, 1117 & 1125(a) & (d); 17 U.S.C. §101 and 18 U.S.C. §1964(c)

## VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY	PERSONAL PROPERTY	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/ Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	
REAL PROPERTY	<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	IMMIGRATION	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	CIVIL RIGHTS	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights
PROPERTY RIGHTS	<input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	SOCIAL SECURITY	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	FEDERAL TAX SUITS	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number:

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

VIII(a). **IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  No  Yes  
If yes, list case number(s): \_\_\_\_\_

VIII(b). **RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  No  Yes  
If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

(Check all boxes that apply)

- A. Arise from the same or closely related transactions, happenings, or events; or
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. **VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
American Rena International Corp., WanZhu "Kathryn" Li, Robert M. Milliken - Los Angeles County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Virginia Wu - Los Angeles County	Alice "Annie" Lin - Alameda County Sis-Joyce international Co., Ltd. - Sacramento County

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

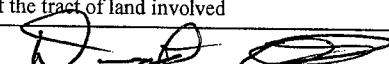
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):

  
David W. Quinto

Date August 13, 2012

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Dolly Gee and the assigned discovery Magistrate Judge is John E. McDermott.

The case number on all documents filed with the Court should read as follows:

**CV12- 6972 DMG (JEMx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:



**Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012



**Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516



**Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

ORIGINAL

## Name &amp; Address:

QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Bruce E. Van Dalsem (Bar No. 124128)  
 David W. Quinto (Bar No. 106232)  
 B. Dylan Proctor (Bar No. 219354)  
 865 S. Figueroa St., 10th Fl., Los Angeles, CA 90017

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

American Rena International Corp., a California corporation; Wanzhu "Kathryn" Li, an individual; and Robert M. Milliken, an individual,

PLAINTIFF(S)

v.

Sis-Joyce International Co., Ltd., a California corporation; Alice "Annie" Lin, an individual; Virginia Wu, an individual; and Does 1 - 10,

DEFENDANT(S).

CASE NUMBER

CV12 06972 DMG (JEMx)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Bruce E. Van Dalsem, whose address is 865 S. Figueroa Street, 10th Fl., Los Angeles, CA 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 8/13/12By: Clower

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]